

February 27, 2009

# Filed Electronically via ECFS

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

Re: Annual 47 CFR §64.2009(e) CPNI Certification

EB Docket No. 06-36

Dear Secretary Dortch:

On behalf of our client, Development Authority of the North Country, Form 499 Filer ID No. 823896 ("DANC"), we transmit herewith DANC's annual CPNI compliance certification and accompanying statement of procedures for the year ended 31 December 2008, in accordance with 47 CFR §64.2009(e).

Very truly yours,

**Hage & Hage LLC** 

IK Hage III

JKH:amc Enclosures

cc: Thomas Sauter, Deputy Executive Director

Development Authority of the North Country

Best Copy and Printing, Inc. (via email)

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Development Authority of the North Country

Form 499 Filer ID: 823896

Name of signatory: Robert Juravich

Title of signatory: Executive Director

I, Robert Juravich, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received or obtained any CPNI. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed:

Robert Juravich

**Executive Director** 

Development Authority of the North Country

#### Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

EB Docket No. 06-36

#### STATEMENT OF PROCEDURES

Development Authority of the North Country, Form 499 Filer ID No. 823896 ("Company") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Company has implemented a system whereby the status of a customer's CPNI approval can be established prior to the use of CPNI.
- Company has implemented a system whereby it educates and trains its employees regarding the appropriate use of CPNI. Company has established disciplinary procedures should an employee violate the CPNI procedures established by Company.
- Company has implemented a system whereby it maintains a record of its sales and marketing campaigns that use its customers' CPNI. Company also has implemented a system whereby it maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. These records are maintained for a minimum of one year.
- Company has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Company compliance for a minimum period of one year. Specifically, Company's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.
- Company has implemented a notification process for both law enforcement and customers in the event of a CPNI breach.